

U.S. BANKRUPTCY COURT
FILED
CAMDEN, N.J.

09 JUN -8 PM 3:45

JAMES J. WALDRON

John T. Kemp
1316 Kings Hwy
Haddon Heights, NJ 08035

June 8, 2009

BY:

Re: Notice of Motion to Dismiss Adversary Proceeding
Case No 08-18700
Adversary cases: 08-2448JHW & 08-2447JHW

Dear Judge Wizmur,

I am filing a response as required by June 8th, 2009 in the motion to dismiss the adversary proceeding in case 08-2448JHW. I believe it is important to note that I just received this motion via certified mail and regular mail on June 5th at 3pm.

After the relief of Mr. Taieb in the adversary proceedings, I have been searching for an attorney with experience in this type of case. I have found Mr. Bruce Levitt, an attorney from Northern NJ, who has expressed interest to represent me. His office is located at 76 South Orange Ave, Suite 305, South Orange, NJ 07079, phone (973) 313-1200.

Mr. Levitt asked me to obtain all pertinent copies of the documents he would need from Mr. Taieb. I have received the copies, although Mr. Taieb informed me that we would have to request to extend the motion for discovery since he had only received the pool servicing agreement from Countrywide and not Chase.

I scheduled an appointment to bring the copies and meet with Mr. Levitt at his office on June 10th. I could not meet earlier than June 10th as Mr. Levitt has been on vacation and was not due back in the office until today.

There are two motions to be heard. One on June 15th, and the other on June 22nd, and I'm asking for a time extension so that Mr. Levitt can review the cases and file the necessary paperwork to take over the representation of the adversary proceedings.

Sincerely,



John T. Kemp